



# Betty Kwan Chinn Homeless Foundation

July 31, 2017

Sent via email to [Christine.Ennis@usdoj.gov](mailto:Christine.Ennis@usdoj.gov) and by US Mail

The U.S. Department of Justice  
Attn: Christine Ennis  
Law and Policy Section  
Environment and Natural Resources Division Law and Policy Section  
P.O. Box 7415, Ben Franklin Station  
WashingtonDC, 20044-7415

RE: Proposed Consent Judgment  
*Humboldt Baykeeper v Royal Gold, LLC.*,  
U.S. District Court Case No.: 3:16-CV-06285-RS (N.D. Cal.).

Dear Deputy Ennis:

The Betty Kwan Chinn Homeless Foundation ("BKC Homeless Foundation") has read the proposed consent judgment in the above matter. BKC Homeless Foundation will spend the monies received under the proposed consent judgment for the purposes specified in the consent judgment as indicated in the proposed consent judgment. Specifically, as specified in section 29, page 14, lines 11 through 25.

BKC Foundation is a 501(c)(3) tax exempt organization whose primary mission is to provide food, shelter and services to homeless persons and will not use any money it receives under the consent judgment for lobbying purposes. BKC Homeless Foundation's primary mission envisions providing services such as installing public toilet facilities along the Humboldt Bay to provide public toilet facilities to the homeless who reside along Humboldt Bay and others and protect Humboldt Bay's water quality and reduce the environmental impact of homeless populations and/or persons to areas along the Humboldt Bay. The proposed funds, and BKC Homeless Foundation's commitment to using them as outlined in the proposed consent judgment will improve water quality in Humboldt Bay and its surrounding wetlands and will reduce the environmental degradation of those areas caused by human waste and waste products and the public health issues associated with that waste and further the public interest as intended by the Clean Water Act.

All money received under the proposed consent judgment will be used for the purposes specified in the proposed consent judgment. When the supplemental environmental project ("SEP") that BKC Homeless Foundation will assume responsibility for is completed, BKC Homeless Foundation will submit a letter describing how the funds were spent to the following parties:

The United States District Court  
Northern District of California San  
Francisco Division  
450 Golden Gate Avenue  
San Francisco, CA 94102-3489

The U.S. Department of Justice  
Attn: Christine Ennis  
Law and Policy Section  
Environment and Natural Resources  
Division Law and Policy Section



Humboldt Baykeeper  
600 F Street, Suite 3 # 810  
Arcata, California 95521  
[ikalt@humboldtbykeeper.org](mailto:ikalt@humboldtbykeeper.org)

Chad Waters, President  
Royal Gold, LLC  
600 F Street, Suite C #603  
Arcata, California 95521  
[info@royalgoldcoco.com](mailto:info@royalgoldcoco.com)

P.O. Box 7415, Ben Franklin Station  
Washington DC, 20044-7415  
[Christine.Ennis@usdoj.gov](mailto:Christine.Ennis@usdoj.gov)  
Jason R. Flanders  
Aqua Terra Aeris Law Group  
828 San Pablo Avenue, Suite 115B  
Albany, California 95706  
[jrf@atalawgroup.com](mailto:jrf@atalawgroup.com)  
James R. Arnold  
The Arnold Law Practice (East Bay  
Office)  
3685 Mt. Diablo Boulevard, Suite 331  
Lafayette, California 94559  
[iarnoldi@arnoldlp.com](mailto:iarnoldi@arnoldlp.com)

I hope this letter satisfies the needs of all parties. If further, information is needed on this matter, please feel contact me at the above address and/or telephone number.

Thank you,

Daniel Price, President  
Betty Kwan Chinn Homeless Foundation

cc: to the following persons/entities

The United States District Court  
Northern District of California San  
Francisco Division  
450 Golden Gate Avenue  
San Francisco, CA 94102-3489

Humboldt Baykeeper  
600 F Street, Suite 3 # 810  
Arcata, California 95521  
[ikalt@humboldtbykeeper.org](mailto:ikalt@humboldtbykeeper.org)

Chad Waters, President  
Royal Gold, LLC  
600 F Street, Suite C #603  
Arcata, California 95521  
[info@royalgoldcoco.com](mailto:info@royalgoldcoco.com)

The U.S. Department of Justice  
Attn: Christine Ennis  
Law and Policy Section  
Environment and Natural Resources  
Division Law and Policy Section  
P.O. Box 7415, Ben Franklin Station  
Washington DC, 20044-7415  
[Christine.Ennis@usdoj.gov](mailto:Christine.Ennis@usdoj.gov)  
Jason R. Flanders  
Aqua Terra Aeris Law Group  
828 San Pablo Avenue, Suite 115B  
Albany, California 95706  
[jrf@atalawgroup.com](mailto:jrf@atalawgroup.com)  
James R. Arnold  
The Arnold Law Practice 3685 Mt.  
Diablo Boulevard, Suite 331  
Lafayette, California 94559  
[iarnoldi@arnoldlp.com](mailto:iarnoldi@arnoldlp.com)